

1 Erica J. Chee
 2 Nevada Bar No. 12238
 3 erica.chee@ogletreedeakins.com
 4 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 5 Wells Fargo Tower
 6 3800 Howard Hughes Parkway, Suite 1500
 7 Las Vegas, NV 89169
 8 Telephone: 702.369.6800
 9 Fax: 702.369.6888

10 Robert W. McFarland (*Pro Hac Vice Forthcoming*)
 11 Amy Morrissey Turk (*Pro Hac Vice Forthcoming*)
 12 MC GUIREWOODS LLP
 13 World Trade Center
 14 101 West Main Street, Suite 9000
 15 Norfolk, Virginia 23510
 16 Phone: (757) 640-3716
 17 Fax: (757) 640-3966
 18 rmcfarland@mcguirewoods.com
 19 aturk@mcguirewoods.com

20 Joel S. Allen (*Pro Hac Vice Forthcoming*)
 21 MC GUIREWOODS LLP
 22 2000 McKinney Ave., Suite 1400
 23 Dallas, Texas 75201
 24 Phone: (214) 932-6400
 25 Fax: (214) 932-6499
 26 jallen@mcguirewoods.com

27 *Attorney for Defendants*
 28 *Portfolio Recovery Associates, LLC and PRA Group, Inc.*

19
UNITED STATES DISTRICT COURT
 20
FOR THE DISTRICT OF NEVADA

21 DELANIE BUTLER and JOHN ROBINSON,
 22 individually and on behalf of all similarly situated
 23 class and collective action members,

24 Plaintiffs,

25 vs.

26 PORTFOLIO RECOVERY ASSOCIATES, LLC, a
 27 Delaware Limited Liability Company; PRA
 GROUP, INC., a Delaware Corporation; DOES I
 through X, inclusive; ROE
 CORPORATIONS I through X inclusive,

28 Defendants.

Case No.: 2:20-cv-00861-JCM-EJY

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO
 RESPOND TO COMPLAINT
 (FIRST REQUEST)**

1 Pursuant to LR 6-1 and 6-2, Plaintiffs Delanie Butler and John Robinson, individually and
2 on behalf of all similarly situated class and collective action members (“Plaintiffs”) and Defendants
3 Portfolio Recovery Associates, LLC, and PRA Group, Inc. (“Defendants”), by and through their
4 undersigned counsel, hereby stipulate and agree to a fifteen-calendar day extension of time, up to
5 and including Friday, July 10, 2020, for Defendants to file a response to Plaintiffs’ Complaint.
6 Plaintiffs’ Complaint was filed on May 12, 2020 (ECF No. 1) and Defendants were served on June
7 4, 2020. Defendants’ response is currently due on June 25, 2020. This is the parties first request for
8 an extension.

9 The parties are engaged in discussions concerning a related case in the United States District
10 Court – Eastern District Court of Virginia. The parties require more time to discuss the severance of
11 the WARN Act claims and the wage and hour claims in Plaintiffs’ Complaint and transfer of the
12 wage and hour claims to the related case, or whether Defendants will be required to file motions
13 requesting the same.

14 ///

15 ///

16 ///

17

18

19

20

21

22

23

24

25

26

27

28

1 Therefore, the parties agree an extension of time is warranted. This stipulation is not brought
2 for the purposes of delay or any other improper purpose.

3 DATED this 24 day of June, 2020.

DATED this 24 day of June, 2020.

4 HUTCHINGS LAW GROUP, LLC

5 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

6 /s/ Mark H. Hutchings
7 Mark H. Hutchings
552 E. Charleston Blvd.
Las Vegas, NV 89104
8 mhutchings@hutchingslawgroup.com
9 Attorney for Plaintiffs

6 /s/ Erica J. Chee
7 Erica J. Chee
3800 Howard Hughes Parkway, Suite 1500
Las Vegas, NV 89169
Phone: (702) 369-6824
erica.chee@ogletree.com

10 Robert W. McFarland (*Pro Hac Vice Forthcoming*)
11 Amy Morrissey Turk (*Pro Hac Vice Forthcoming*)
12 McGUIREWOODS LLP
13 101 West Main Street, Suite 9000
Norfolk, Virginia 23510
Phone: (757) 640-3716
14 rmcfarland@mcguirewoods.com
aturk@mcguirewoods.com

15 Joel S. Allen (*Pro Hac Vice Forthcoming*)
16 McGUIREWOODS LLP
17 2000 McKinney Ave., Suite 1400
Dallas, Texas 75201
Phone: (214) 932-6400
18 jallen@mcguirewoods.com

19 *Attorneys for Defendants*

20

21 **ORDER**

22 **IT IS SO ORDERED.**

23 
24 UNITED STATES MAGISTRATE JUDGE

25 June 24, 2020

26 DATED